

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GREEN STAR ENERGY SOLUTIONS, LLC,

Plaintiff,

vs.

EDISON PROPERTIES, LLC, EDISON
CONSTRUCTION MANAGEMENT, LLC, UA
BUILDERS CORP., PASQUALE SURIANO
and JOE PIPIA,

Defendants.

Case No.: 1:21-cv-02682-LJL

**NOTICE OF DEFENDANTS' MOTION TO
SEVER CLAIMS, TRANSFER VENUE,
AND EXTEND TIME TO ANSWER**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law In Support of Defendants', Edison Properties, LLC ("Edison Properties"), Edison Construction Management, LLC ("ECM"), Pasquale Suriano ("Suriano"), and Joseph Pipia (collectively, "Defendants"), Motion to (i) Sever Claims, (ii) Transfer Venue to the United States District Court for the District of New Jersey, and (iii) Extend Defendants' Time to Answer or Otherwise Respond to the Complaint (the "Motion"), dated April 5, 2021, the Declaration of Michael H. Ansell, Esq., dated April 5, 2021, and its Exhibits, and the Declaration of Pasquale Suriano, dated April 5, 2021, by their counsel will move this Court, before the Honorable Lewis J. Liman, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., Courtroom 15-C, New York, New York 10007-1312, for an Order: (i) severing the claims of Plaintiff Green Star Energy Solutions, LLC ("Green Star" or "Plaintiff"); (ii) transferring venue of the claims related to the New Jersey Project to the United States District Court for the District of New Jersey; (iii) remanding the New York Project claims to State Court under the docket *Green Star Energy*

Solutions, LLC v. Edison Properties, LLC, et al., Index No. 651345/2021; and (iv) extending Defendants' time to answer or otherwise respond to the Complaint, and granting such other and further relief as the Court deems appropriate.

Dated: April 5, 2021

BRACH EICHLER LLC

/s/Michael H. Ansell

Michael H. Ansell, Esq.

101 Eisenhower Parkway

Roseland, New Jersey 07068

(973)-228-5700

mansell@bracheichler.com

*Attorneys for Defendants Edison Properties,
LLC, Pasquale Suriano, Edison
Construction Management, LLC and Joseph
Pipia*